

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN

Plaintiff,

vs.

CHRISTOPHER ELLIS BOUZY, BOT
SENTINEL, INC, GEORGE WEBB
SWEIGERT, DAVID GEORGE SWEIGERT,
BENJAMIN WITTES, NINA JANKOWICZ,
ADAM SHARP, MARGARET ESQUENET,
THE ACADEMY OF TELEVISION ARTS
AND SCIENCES, SETH BERLIN,
MAXWELL MISHKIN

Defendants

Case No.: 1:21-cv-10878-AT-JLC

REQUEST FOR JUDICIAL NOTICE

AND EVIDENTIARY HEARING

Pro Se plaintiff Jason Goodman (“Goodman”) respectfully submits this request for judicial notice of relevant facts and an oral arguments hearing on the evidence. Goodman alleges as follows, upon actual knowledge with respect to himself and his own acts, and upon information and belief as to all other matters.

ONGOING PATTERN OF RACKETEERING ACTIVITY

1. False Report Filed with Arlington Police Department

On or about January 5, 2023, defendant Nina Jankowicz (“Jankowicz”) with the help of defendants David George Sweigert (“Sweigert”), Benjamin Wittes (“Wittes”) and her counsel Liz Lockwood (“Lockwood”), calculated a scheme to file a false police report with the Arlington Police Department (“APD”) claiming Goodman harassed Jankowicz. **(EXHIBIT A)**

1 The report was filed in response to a litigation warning Goodman sent by email, alleging
2 false statements made by Jankowicz to Twitter on January 4, 2023. Goodman's email warned
3 that failure to retract the statements would result in legal action. **(EXHIBIT B)**
4

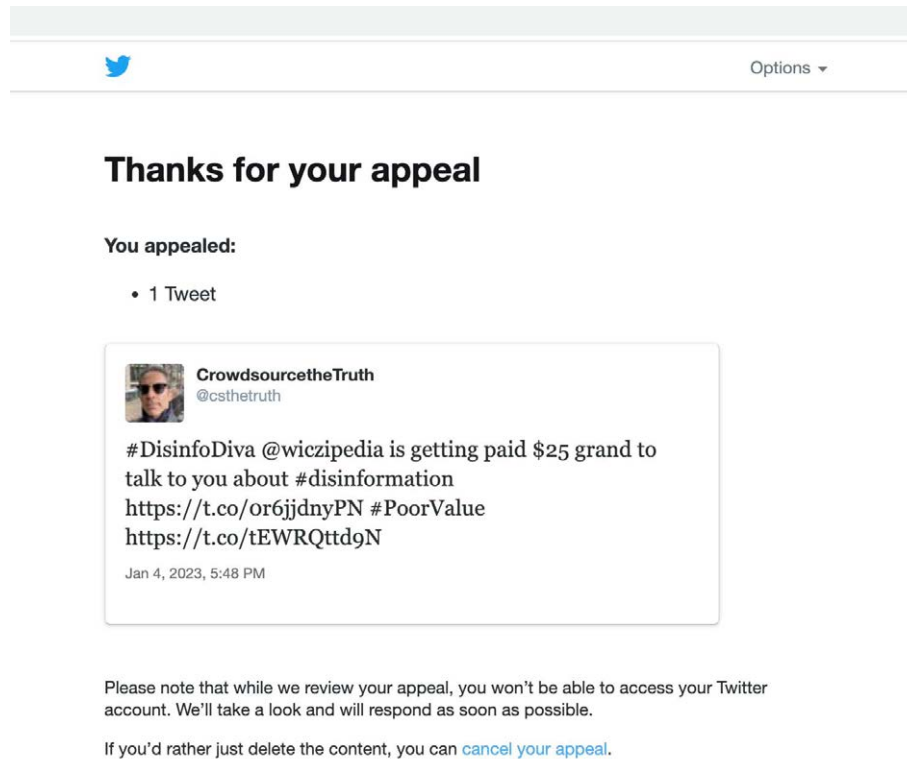
5 In the police report, Jankowicz falsely stated that Goodman had posted "a video that
6 includes my home address" and further claimed Goodman had committed the crime of fraud "by
7 recording phone calls with [her] under false pretenses". Jankowicz went on to say that Goodman
8 engaged in "extensive cyberstalking, harassment, frivolous legal intimidation, and conspiratorial
9 defamation". Each of these claims are false and Jankowicz knew they were false or reasonably
10 should have known they were false at the time she made them.
11

12 Goodman did nothing fraudulent. Under Virginia law, a party alleging fraud must prove
13 by clear and convincing evidence (1) a false representation, (2) of a present, material fact, (3)
14 made intentionally and knowingly, (4) with intent to mislead, (5) reasonable reliance by the party
15 misled, and (6) resulting damage to him. *See Thompson v. Bacon*, 245 Va. 107, 111 (1993).
16

17 Goodman did not harass Jankowicz. Goodman's communications with Jankowicz do not
18 meet any of the elements of harassment as described in § 18.2-427 of Virginia penal code which
19 states in relevant part, "Any person who uses obscene, vulgar, profane, lewd, lascivious, or
20 indecent language, or makes any suggestion or proposal of an obscene nature, or threatens any
21 illegal or immoral act with the intent to coerce, intimidate, or harass any person, over any
22 telephone or citizens band radio, in this Commonwealth, is guilty of a Class 1 misdemeanor."
23

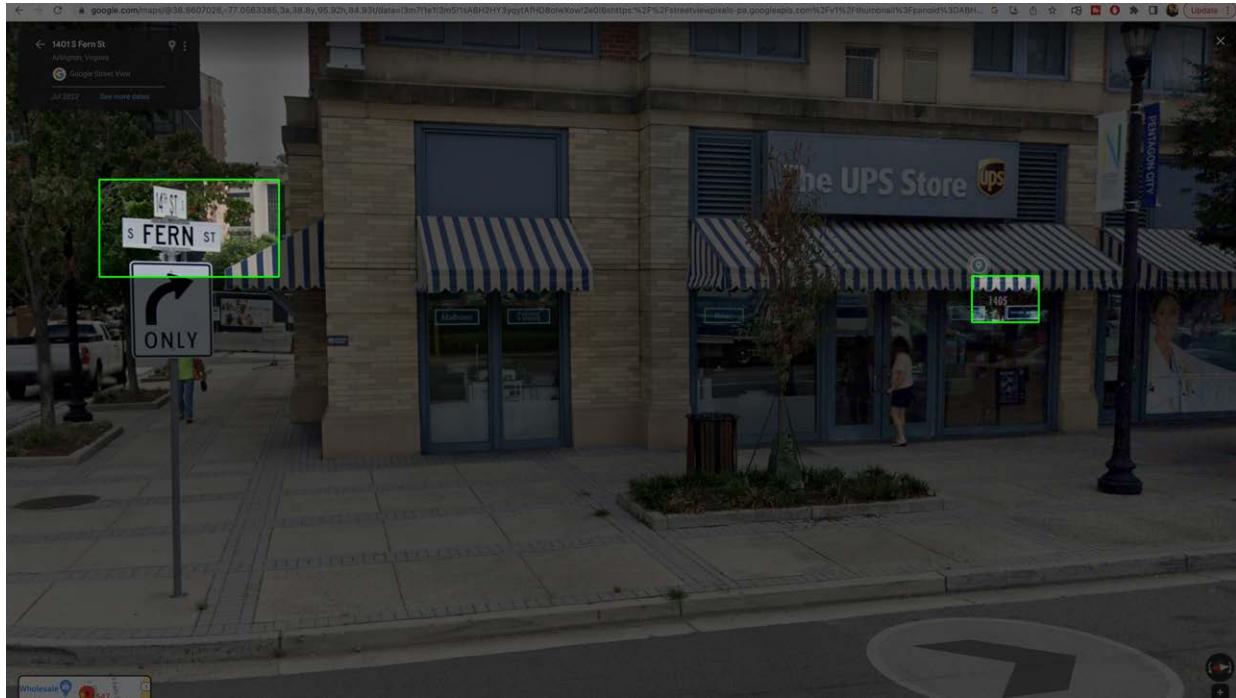
24 Goodman's communications with Jankowicz had legitimate purpose and were not intended to
25 harass and did not meet the elements of harassment. Despite these facts, Jankowicz made false
26 statements to Twitter, law enforcement and the Arlington General District Court with actual
27 malice and deliberate intent to harm Goodman. Based on Jankowicz' false claims, the January 4
28

Tweet was removed, and Goodman's Twitter account was suspended. Twitter refuses to respond to appeals. The Tweet remains visible only to Goodman, along with a demand that he retract it and admit to violating a Twitter policy or else remain suspended.



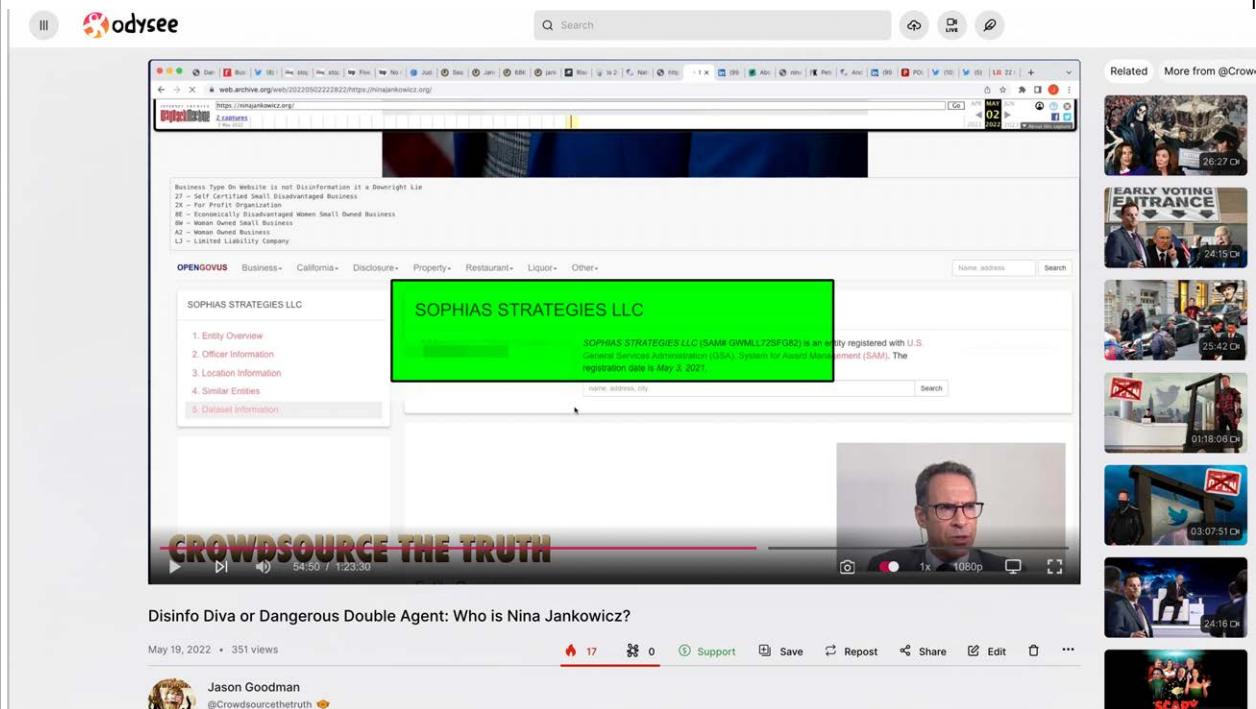
Goodman's tweet included two URL hyperlinks. The first, (<https://t.co/0r6jjdnyPN>) links to a U.S. Government website containing Jankowicz' public filing pursuant to 22 U.S. Code § 611, the Foreign Agent Registration Act ("FARA"). (See 1:21-cv-10878-AT-JLC Document 132 Filed 02/17/23 Page 109 of 138). The Department of Justice website says, "The FARA Unit makes registration information and disclosures available to the public to inform the public about the activities of foreign agents within the United States." Based on this fact, even if Jankowicz had used her home address to register as a foreign agent, she would be voluntarily putting that

information into the public domain. As a limited purpose public figure, it is reasonable first amendment activity for Goodman or any other member of the public to inspect public documents or otherwise inquire into, and comment publicly on activities of registered foreign agents within the United States including Jankowicz. In this case, the address Jankowicz used was a retail UPS Store in Arlington VA and not her home address as falsely declared in the police report.



The second link included in Goodman's January 4 Tweet (<https://t.co/tEWRQttd9N>) is a link to a video on Goodman's Odysee.com social media channel. The linked video is a news report published by Goodman on May 19, 2022. This is an updated version of Goodman's earlier report about Jankowicz. The May 19 version of the video was edited to blur addresses and remove other information that Jankowicz and Sweigert had complained to Twitter, YouTube and Patreon.com about. Their complaints alleged Goodman violated those sites' policies on publishing private information. Twitter and YouTube acted on the complaints and terminated

Goodman's accounts. Patreon allowed Goodman to retain his account by replacing the video with the newly edited May 19 version that omitted alleged personal information.



As a courtesy to Jankowicz and to avoid malicious attacks on his other social media properties, Goodman voluntarily removed references to information Jankowicz indicated she objected to after she filed complaints against Goodman. The video linked to the January 4 Tweet does not and did not contain any of Jankowicz' personal information. She either deliberately made a false statement or failed to review the content of the tweet and included video to confirm her allegation before filing the false report with Twitter, the APD and the Arlington court.

2. False Petition Filed with the Arlington General District Court

On January 9, 2023, Goodman filed a motion which revealed he would not be home in New York for an extended period. Upon learning this, and with the assistance of Sweigert, Wittes, and her attorney, Jankowicz calculated a scheme to fraudulently obtain a preliminary protective order ("PPO") against Goodman. Defendants conspired to deprive Goodman of first REQUEST FOR JUDICIAL NOTICE AND EVIDENTIARY HEARING - 5

1 and second amendment rights and also conspired to make false statements to law enforcement
2 and the court. Jankowicz' police report oscillates between referring to her in the first person and
3 the third person, suggesting it was written with the assistance of a third party. Goodman was
4 served at his apartment with notice but did not learn of the service until after the hearing when he
5 returned to New York. Goodman was present at the second hearing, wherein Jankowicz
6 admitted that Goodman had not threatened her. She clarified further that according to her, a third
7 party had apparently observed Goodman's news report online and that third party allegedly
8 threatened and harassed Jankowicz. No evidence aside from Jankowicz' testimony has been
9 presented to support this allegation to Goodman's knowledge. Goodman did not threaten or
10 harass Jankowicz. Goodman did not instruct anyone to threaten or harass Jankowicz. Goodman
11 did not encourage anyone to take any action relative to Jankowicz. Goodman has only engaged
12 in legitimate first amendment protected activity with regard to Jankowicz.
13
14

15 There was a hearing at Arlington General District Court on the Jankowicz petition on
16 February 14, 2023 at 2pm. Goodman pre-recorded a video and set it to broadcast at noon the
17 same day, two hours prior to the hearing. The video had a duration of approximately thirty
18 minutes and explained that Jankowicz had obtained the PPO under false pretenses while
19 Goodman was away and that there would be a hearing about it. At exactly 11:56am on February
20 14, Sweigert sent an email alerting Lockwood to the publication of the video. **(EXHIBIT C)**
21
22

23 Sweigert's email was sent one minute after Goodman's video became public knowledge
24 and four minutes prior to its broadcast premiere. The timing demonstrates that Sweigert was
25 watching Goodman's social media as he has frequently admitted he does, and was waiting for
26 any information he could provide to Jankowicz and her attorney to assist them in obtaining the
27 fraudulent protective order that is now in place. The order bars Goodman from speaking about
28

Jankowicz publicly even if she became the top national news story as she was in April 2022. It further bars Goodman from obtaining a firearm. At approximately 1pm, just after the video ended, Sweigert tweeted an image he screen captured from Goodman's video. **(EXHIBIT D)**

In a remarkable display of coordination, a printout of this screen capture was shown in court in Arlington less than ninety minutes later by Jankowicz' attorney. Swigert has since deleted the Tweet so it cannot be seen by the public, but Goodman preserved it on February 14.

Jankowicz coordinated with Sweigert and others to calculate a scheme with actual malice intended to harm Goodman. Jankowicz either failed to review the updated May 19 video included in Goodman's January 4 Twitter post, or otherwise deliberately made a false statement to Twitter, the Arlington Police and the Arlington General District Court with the express intent of harming Goodman. Jankowicz and her coconspirators' wrongful acts have infringed on Goodman's first and second amendment rights, have denied him the right to due process and a fair trial and continue to deny his rightful access to his valuable branded social media accounts.

3. Misleading the Public to Fraudulently Finance Legal Defense Fund

On March 1, 2023, one day after Goodman filed a motion seeking leave to file an amended complaint, Jankowicz launched a Go Fund Me campaign which claims it will finance a lawsuit against Fox News for allegedly defaming Janowicz. (<https://www.gofundme.com/f/help-nina-hold-fox-news-accountable-for-its-lies>). The campaign includes a link to a professionally produced five-minute video featuring Jankowicz describing the alleged defamatory statements. The campaign is misleading because there is no lawsuit against Fox News. Potential donors must not only read a lengthy text description, but also proactively click on a "read more" link before it is revealed that Jankowicz had "obtained a protective order against one of my more persistent individual harassers" referring to Goodman, and that she, "had to retain an attorney to

1 help me with the protective order.” Jankowicz admits in this public statement against interest
 2 that her attorney assisted in obtaining the fraudulent PPO. Jankowicz further states “I have been
 3 named as a defendant in frivolous, nonsensical lawsuits, and have had to retain separate counsel
 4 to assist me with one of them.” Jankowicz has no actual plans to file a lawsuit against Fox News
 5 and nothing cited in the video rises to the level of defamation or any other actionable claim.
 6

7 CONCLUSION

8 When evaluating RICO claims, courts weigh the likelihood of ongoing harm due to a
 9 pattern of racketeering activity versus the possibility of a coincident, unrelated collection of
 10 common business torts. Even if the Court finds Goodman’s current RICO pleadings inadequate,
 11 defendants’ ongoing pattern of related racketeering activity continues to harm Goodman and has
 12 even increased its harm as this case has proceeded. Goodman respectfully requests the Court
 13 grant Goodman leave to cure any defects it may find in his current pleading, and also summon
 14 the parties for an evidentiary hearing to review relevant evidence under oath. Goodman further
 15 moves the Court to order defendants to withdraw their malicious complaints, assist in vacating
 16 the fraudulent PPO, assist in restoring Goodman’s @csthetruth Twitter account, and to terminate
 17 the fraudulent Go Fund Me campaign in addition to any other relief the Court finds appropriate.
 18
 19
 20

21 Signed this 23rd day of March 2023

22 Respectfully submitted,



24 Jason Goodman, Plaintiff, Pro Se
 25 252 7th Avenue Apt 6s
 26 New York, NY 10001
 27 (323) 744-7594
truth@crowdsourcethetruth.org

(EXHIBIT A)

ARLINGTON COUNTY POLICE DEPARTMENT SUMMARY INCIDENT REPORT



REPORT NUMBER: 2023-01064022

INCIDENT INFORMATION

INCIDENT CODE HARASS	INCIDENT TYPE Annoying Phone Calls	INITIAL SUPP <input checked="" type="checkbox"/>	DATE/TIME STARTED 05/12/2022 02:38 PM	DATE/TIME ENDED 01/05/2023 04:00 PM	DATE/TIME REPORTED 01/05/2023 04:20 PM
REPORT FILED FROM 173.66.125.240	TRACKING NUMBER T23000083	LOCATION OF OCCURRENCE [REDACTED]			APPROVED BY: 1315/J. Adams
LOCATION TYPE Other/Unknown	THEFT TYPE	METHOD OF ENTRY	METHOD OF EXIT	PT OF ENTRY	PT OF EXIT
ENTRY LOC					

PERSON LISTINGS

TYPE	LAST NAME	FIRST NAME	MIDDLE NAME	DOB	RACE	SEX	DRIVER LIC NO	LIC ST
Victim	Jankowicz	Nina		[REDACTED]	White	F		
SSN	ETHNICITY	RESIDENT	EYE COLOR	HAIR COLOR	AGE	HEIGHT	WEIGHT	CELL PHONE
	Non-hispanic Or	Resident						
EMAIL	RESIDENCE ADDRESS				HOME PHONE			
[REDACTED]	[REDACTED]				[REDACTED]			
EMPLOYER NAME	BUSINESS ADDRESS				WORK PHONE			

NARRATIVE

Jason Goodman of "Crowdsourcing the Truth" is a self-styled investigative journalist and for-profit conspiracy theorist. Goodman has engaged in extensive cyberstalking, harassment, frivolous legal intimidation, and conspiratorial defamation of me, directly inspiring at least one death threat made to me.

Starting in April 2022, shortly after the announcement of DHS' Disinformation Governance Board of which I was executive director, Jason Goodman began making regular video broadcasts about me and my role, defrauding me by recording phone calls with me under false pretenses and violating the policies of various social media sites by posting a long conspiratorial video that included documents showing the home addresses and other personally identifying information of me and my family.

Between April 2022 and January 2023, he has made over 80 other mentions of me in his frequent video livestreams and other public posts, usually linking to or showing this personal information. Repeatedly included in his video broadcasts information and photo metadata from many publicly-available and formerly-publicly-available websites about all aspects of my career and personal life, including: a cached version of her wedding registry, no longer publicly available; multiple attempts identify my husband; a failed attempt to find her high school yearbook online.


Goodman continues to call and email me, as recently as today, and continues to share a video that includes my home address and other information about my family. He now is threatening litigation against me in these communications because he alleges that I made a "fraudulent complaint" to Twitter in order to get his doxxing content removed. He is associated with noted right wing conspiracy theorists including Alex Jones of InfoWars and given the threats I have had directed at me in recent months since I resigned from the US Government, I continue to worry for my family's safety as he incessantly shares my personal information.

(Det. Adams #1315 - I spoke with the reporting party and they advised me that the individual did not specifically make a death threat towards them, it was supposedly one of his online followers. The reporting party just want the incident documented for right now.)

REPORT NUMBER: 2023-01064022

- Select the most appropriate description = [Email – Use of Computer to Harass]

(EXHIBIT B)

From: Jason Goodman truth@crowdsourcethetruth.org 
Subject: Litigation warning
Date: January 4, 2023 at 10:16 PM
To: nina*****.com

JG

Ms. Jankowicz,

On January 4, 2023 I posted a tweet on Twitter.com that included a link to your public Registration Statement filed by you pursuant to 22 U.S. Code § 612 The Foreign Agent Registration Act ("FARA"). The FARA Unit makes registration information and disclosures available to the public to inform the public about the activities of foreign agents within the United States.

On January 4, 2023 you falsely represented to Twitter that I violated their rule against posting private information. If you do not immediately withdraw your fraudulent complaint you may be subject to legal action by me.

I will remind you that immediately following my publication of a report that alleged you were in violation of 22 U.S. Code § 612 you resigned from your position with the U.S. Dept. of Homeland Security, (<https://odysee.com/@Crowdsourcethetruth:d/2022-05-16-20-00-03-Live:9?r=73LTQ7izBcj8qkyQcMRLcevmepnUuBoJ>).

Your resignation coincided with the termination of my access to several social media accounts that were vital components of my business. You subsequently filed the Registration Statement I linked to on Twitter in November of 2022.

If you do not act on this warning immediately I reserve all rights with regard to further legal action in this matter.

You are further instructed to preserve all communications you have had with any other parties pertaining to me or any social media accounts operated by me including @csthetruth on Twitter and any Crowdsourcethe Truth or Jason Goodman branded social media accounts or content.

Thank you for your prompt attention.

Jason Goodman



Options ▾

Thanks for your appeal

You appealed:

- 1 Tweet



CrowdsourcetheTruth
@csthetruth


#DisinfoDiva @wiczipedia is getting paid \$25 grand to talk to you about #disinformation
<https://t.co/or6jjdnyPN> #PoorValue
<https://t.co/tEWRQtttd9N>

Jan 4, 2023, 5:48 PM

Please note that while we review your appeal, you won't be able to access your Twitter account. We'll take a look and will respond as soon as possible.

If you'd rather just delete the content, you can [cancel your appeal](#).

(EXHIBIT C)

From: Spoliation Notice spoliation-notice@mailbox.org 
Subject: New YouTube video REF: 1:21-cv-10878-AT-JLC Goodman v Bouzy et al
Date: February 14, 2023 at 11:56 AM
To: Jason Goodman truth@crowdsourcethetruth.org
Cc: spoliation@posteo.net, George Webb Sweigert georg.webb@gmail.com, Seth D. Berlin BerlinS@ballardspahr.com, Maxwell S. Mishkin MishkinM@ballardspahr.com, Liz Lockwood liz.lockwood@alilockwood.com, Margaret Esquenet margaret.esquenet@finnegan.com, Spoliation Notice spoliation-notice@mailbox.org

See attachments and

<https://www.youtube.com/watch?v=8IcJugXmI4c> goodman- default-
feud.pdf goodman.pdf

(EXHIBIT D)



E.U. Concerned Citizen @LiberateYoutube · 3h

...

Jason Goodman gets a Virginia protective order - ouch

@Natethelawyer #lawnerds @HuffPost #LAWTUBE #SunshineSachs
#SussexSquad Bouzy

@RoyalFamily @vicenews #sdy @CPSUK @thehill @InsideEdition
@metpoliceuk #yankeewally

@INTERPOL_HQ @WIRED @BrookingsInst @TelevisionAcad @TheEmmys



E.U. Concerned Citizen @LiberateYoutube · Feb 13

...

Whoopsie Doodle #YankeeWally Chris Bouzy trending Brookings Institute
@DHSgov

@natethelawyer #lawnerds George Webb @buzzfeed @newsweek
@TheEmmys @TheEmmys @huffpost @hunleyeric @CBSNews
@VICENews

Stop your lawfare attacks on me

← **Tweet**



Oops I crapped my pants

@LiberateYoutube

3D guy Jason Goodman gets no firearms restraining order -- George Webb / Chris Bouzy #LAWTUBE #SunshineSachs #SussexSquad @winkie_doo @RoyalFamily @natlawyerchic @realgeorgewebb1 @vicenews @RollingStone @wiczipedia @BuzzFeed @WIRED @BrookingsInst @buzzfeed @TheEmmys #lawnerds

**PROTECTIVE
ORDER**



8:13 PM · Feb 14, 2023 · **252** Views



(EXHIBIT E)

Phone call from Jason Goodman to Nina Jankowicz May 12, 2022 2:38pm

00;00;00;00 - 00;00;01;00

Goodman

Hello? Nina?

00;00;01;00 - 00;00;01;23

Jankowicz

Yes

00;00;01;23 - 00;00;02;25

Goodman

It's Jason Goodman. How are you?

00;00;03;25 - 00;00;04;22

Jankowicz

Uh, good. How are you?

00;00;04;29 - 00;00;11;04

Goodman

I'm doing well. I don't know. Has Brandy Zadrozny mentioned anything about me? Are you aware of who I am?

00;00;12;00 - 00;00;21;00

Jankowicz

Uh, I. Your name is familiar, but I don't think Brandy has mentioned anything. Maybe Ben did. Um. Well, tell me.

00;00;21;16 - 00;00;32;06

Goodman

I'm just the host of CrowdSource the Truth, and I'm very interested in what you're doing with the Disinformation Governance board. And I wanted to see if you might be available for an interview.

00;00;33;10 - 00;00;42;13

Jankowicz

I am, unfortunately, embargoed. Um, from speaking right now. Really? Um, much to my chagrin and displeasure.

00;00;43;03 - 00;00;47;24

Goodman

Huh. And that's what pending your confirmation. What's the status of the board?

00;00;47;25 - 00;01;10;13

Jankowicz

No, there's. There's no. There's no confirmation. I'm not a senior executive service member. I've been up at the department since March, and there's no confirmation. I'm. I'm just embargoed because of the abuse and harassment I have been enduring since this was all announced and the lack of departmental strategy about how to communicate about it. So, uh, yeah.

00;01;10;18 - 00;01;14;16

Goodman

So is it a self-imposed embargo or you've been told by the DHS not to.

00;01;14;29 - 00;01;17;03

Jankowicz

Uh, the, the press shop? Yeah.

00;01;17;20 - 00;01;25;22

Goodman

Mm hmm. So when will the position officially begin? Like, when is this going to end? Will it be like an office in Washington, DC? Is any of this been decided yet?

00;01;27;06 - 00;01;31;25

Jankowicz

I, i again, I started in March. Um, so it has begun

00;01;31;26 - 00;01;32;29

Goodman

So you're working already?

00;01;33;06 - 00;01;36;01

Jankowicz

Yeah. Yeah. I'm an employee of the Department of Homeland Security.

00;01;36;23 - 00;01;44;05

Goodman

And what happens if you determine that someone's put out disinformation? What does the Department of Homeland Security do?

00;01;44;05 - 00;01;48;06

Jankowicz

That has nothing to do with my job. Who did you say you are again?

00;01;48;12 - 00;01;49;04

Goodman

Jason Goodman.

00;01;50;20 - 00;01;54;03

Jankowicz

Uh, and what publication are you with?

00;01;54;13 - 00;01;55;20

Goodman

CrowdSource the truth.

00;01;56;15 - 00;02;01;12

Jankowicz

Okay. Ah, What are you calling me for right now?

00;02;01;12 - 00;02;03;19

Goodman

Well, I wanted to invite you on an interview, as I said.

00;02;04;10 - 00;02;10;21

Jankowicz

Right. But I told you I can't do an interview. So, uh, I don't. I don't know what we're talking about.

00;02;10;21 - 00;02;15;15

Goodman

I'm just trying to determine what it is that this department, you know, this disinformation governance...

00;02;15;16 - 00;02;18;13

Jankowicz

I would refer you to the fact sheet that was put out that.

00;02;18;14 - 00;02;27;26

Goodman

You've already been doing since March. I mean, I've looked at that and it's not really clear. I think everybody has a lot of questions. And you're saying that you don't want to do an interview and the department has.

00;02;27;26 - 00;02;31;11

Jankowicz

No, I am not allowed to do an interview and I'm going to get off the phone with you right now.

00;02;31;18 - 00;02;33;19

Goodman

Mm hmm. Well, I think...